

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT

JACE BOSTON, LLC and ARTHUR LEON,

Plaintiffs,

v.

LANDMARK AMERICAN INSURANCE CO.,
AMERICAN SAFETY INDEMNITY CO.,
FIRST MERCURY INSURANCE CO., and
NAVIGATORS SPECIALTY INSURANCE CO.,

Defendants.

C.A. No.: 2184cv01056

E-FILED 7/1/2021

BL

ENTRY OF APPEARANCE

NOTICE TO THE CLERK OF THE ABOVE-NAMED COURT:

Barbara O'Donnell hereby enters her appearance as attorney for defendant, American
Safety Indemnity Company, in this action.

Defendant
AMERICAN SAFETY INDEMNITY CO.

/s/ Barbara O'Donnell

Barbara O'Donnell, Esq.
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CERTIFICATE OF SERVICE

I, Barbara O'Donnell, hereby certify that on this 1st day of July 2021, I filed and served a copy of the foregoing Entry of Appearance on all parties to this action through the electronic filing system and by mailing same, postage prepaid, as follows:

FOR PLAINTIFFS:

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/s/ *Barbara O'Donnell*

Barbara O'Donnell

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*Defendants.*C.A. No.: 2184cv01056 **G**

7/1/2021

e-filed KG

**ASSENTED-TO MOTION TO EXTEND DEFENDANTS'
TIME TO RESPOND TO PLAINTIFFS' COMPLAINT**

Pursuant to Mass. R. Civ. P. 6(b), the undersigned defendants hereby move, with the plaintiffs' consent, to extend their respective deadlines to file and serve their answers or other responsive pleadings to the plaintiffs' complaint in this action to and including August 4, 2021.

In support of this motion, the defendants state as follows:

1. At various dates between June 11 and June 18, 2021, the plaintiffs' summons and complaint was served on the four (4) named defendants in this action, with the undersigned counsel subsequently retained to represent the defendants in this action;
2. To afford the defendants' respective counsel an adequate opportunity to obtain and review relevant information concerning the plaintiffs' asserted entitlement to coverage for the claims asserted in the underlying litigation, plaintiffs' counsel agreed to extend the defendants' respective deadlines to file their responses to the complaint to and including August 4, 2021;
3. None of the parties to this Action will be prejudiced by the Court's allowance of this motion.

DATED: July 1, 2021

Respectfully submitted,

FOR DEFENDANT,
AMERICAN SAFETY INDEMNITY CO.,

/s/ Barbara O'Donnell

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ASSENTED TO: FOR PLAINTIFFS
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/s/ Barbara O'Donnell

Barbara O'Donnell